

JON M. ICHINAGA (#137290)
 Chief Counsel
 Jon.Ichinaga@dfeh.ca.gov
 MARI MAYEDA (#110947)
 Associate Chief Counsel
 Mari.Mayeda@dfeh.ca.gov
 ALEXANDRA SELDIN (#239708)
 Senior Staff Counsel
 Alexandra.Seldin@dfeh.ca.gov
 JULIA L. MONTGOMERY (#184083)
 Senior Staff Counsel
 Julie.Montgomery@dfeh.ca.gov
 DEPARTMENT OF FAIR EMPLOYMENT
 AND HOUSING
 2218 Kausen Drive, Suite 100
 Elk Grove, CA 95758
 Telephone: 916-478-7251
 Fax: 888-382-5293

Attorneys for Plaintiff
 Phyllis W. Cheng, Director of the California
 Department of Fair Employment and Housing

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

PHYLLIS W. CHENG, in her official capacity)
 as DIRECTOR OF THE CALIFORNIA)
 DEPARTMENT OF FAIR EMPLOYMENT)
 AND HOUSING, an agency of the State of)
 California, on behalf of Real Parties in Interest)
 and all Similarly Situated Individuals,)
 Plaintiff,)
 v.)
 WINCO FOODS, LLC; WINCO HOLDINGS,)
 INC.,)
 Defendants.)
 _____)
 CRISTINA VERDUZCO, an Individual; and)
 ANGELINA GONZALEZ-DIAZ, an)
 Individual, and all other similarly situated)
 individuals,)
 Real Parties in Interest.)

CASE NO: 3:14-CV-00483 JST
STIPULATION TO EXTEND TIME TO
FILE PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS
COMPLAINT AND DEFENDANT'S
REPLY BRIEF; [~~PROPOSED~~] ORDER



1 Pursuant to Civil Local Rule 6-1(b) and 6-2(a), Plaintiff PHYLLIS W. CHENG, in her
2 official capacity as DIRECTOR OF THE CALIFORNIA DEPARTMENT OF FAIR
3 EMPLOYMENT AND HOUSING (“DFEH”) and Defendants WINCO FOODS, LLC and WINCO
4 HOLDINGS, INC. (“Defendant”) stipulate to the following:

5 1. On March 4, 2014, Defendant filed the Notice of Motion and Motion to Dismiss
6 Plaintiff’s Complaint; Memorandum of Points and Authorities in Support Thereof (“Motion”),
7 (Docket No. 10). The Motion was noticed for hearing on April 10, 2014.

8 2. On March 5, 2014, the Court issued a Notice Continuing Motion Hearing as to
9 Motion to Dismiss, to April 24, 2014 (Docket No. 14).

10 3. The Parties stipulate that the deadlines to file Plaintiff’s Opposition and Defendant’s
11 Reply may be extended by one week each, so that DFEH may file and serve the Opposition to
12 Defendant’s Motion to Dismiss on or before March 25, 2014, and Defendants may file and serve a
13 Reply in Support of the Motion to Dismiss on or before April 8, 2014.

14 4. The parties further stipulate to cooperate and grant each other courtesy extensions as
15 they are needed in discovery or otherwise in litigation to the extent those extensions will not
16 jeopardize the parties’ respective interests.

17 Respectfully Submitted,

18 Dated: March 11, 2014

19 DEPARTMENT OF FAIR EMPLOYMENT AND
20 HOUSING

21 By: /s/ Alexandra Seldin
22 Alexandra Seldin
23 Attorneys for Plaintiff DFEH



1 Dated: March 12, 2014

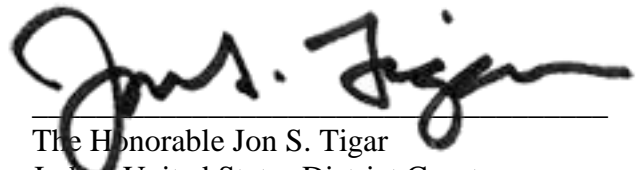
SEYFARTH SHAW, LLP

2
3 By: /s/ Kristina Launey
4 Kristina Launey
5 Attorneys for Defendant

6
7 Pursuant to the parties' stipulation and the accompanying Declaration of Alexandra Seldin, it
8 is hereby ORDERED that Plaintiff will file and serve its Opposition to Defendants' Motion to
9 Dismiss on or before March 25, 2014, and Defendant will file and serve its Reply on or before April
10 8, 2014.

11 Pursuant to stipulation, IT IS SO ORDERED.

12
13 Dated: March 13, 2014

14 By: 
15 The Honorable Jon S. Tigar
16 Judge, United States District Court
17 For the Northern District of California
18
19
20
21
22
23
24
25
26
27

